

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GRAPHIC ARTS MUTUAL INSURANCE COMPANY	:	
	:	
	:	
Plaintiff,	:	
v.	:	Civ. Action No. 1:06-CV-0246 (JJF)
	:	
INDIAN RIVER SCHOOL DISTRICT	:	
INDIAN RIVER SCHOOL BOARD,	:	
HARVEY L. WALLS, MARK A. ISAACS,	:	
JOHN M. EVANS, RICHARD H. COHEE,	:	
GREGORY A. HASTINGS, NINA LOU	:	
BUNTING, CHARLES M. BIRELEY,	:	
DONALD G. HATIER, REGINALD L. HELMS,	:	
M. ELAINE McCABE, LOIS M. HOBBS,	:	
and EARL J. SAVAGE	:	
	:	
Defendants.	:	

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANTS
TO RESPOND TO PLAINTIFF'S COMPLAINT**

The defendants, by and through its undersigned attorneys, Drinker Biddle & Reath LLP, hereby submit this unopposed motion for an order extending the time for defendants to respond to plaintiff's complaint, and in support thereof aver as follows:

1. On April 12, 2006, Graphic Arts Mutual Insurance Company ("Graphic Arts") filed a complaint for declaratory relief and restitution/quantum meruit.
2. The complaint alleged that the defendants breached their insurance contract in connection with an underlying lawsuit, *Dobrich, et. al. v. Indian River School District, et. al.*, No. 05-00120 (D.De.). Graphic Arts seeks declaratory and other relief relative to its defense and indemnity obligations under the applicable insurance contract.
3. The plaintiff named fourteen separate defendants. Their answers were originally due at various times between May 3, 2006 through May 15, 2006.

4. On May 2, 2006, Drinker Biddle & Reath LLP was retained by each of the defendants to represent them in the above-captioned litigation.

5. On May 3, 2006, the parties filed a stipulation to extend the time to answer, move or otherwise plead in response to plaintiff's complaint to May 26, 2006.

6. On May 10, 2006, counsel for both parties had a meeting to discuss this lawsuit and the underlying lawsuit.

7. At the meeting and shortly thereafter, the parties determined that it would be appropriate to pursue a global settlement that would involve the underlying lawsuit, for which Drinker Biddle & Reath LLP also serves as counsel, as well as this lawsuit.

8. In light of these continuing settlement efforts, and the possibility that this and the underlying lawsuit may be resolved shortly, the defendants request a further extension of time to answer, move, or otherwise plead until June 13, 2006. This extension of time will allow the parties to pursue their settlement efforts.

9. Granting this extension will cause no prejudice to any of the parties. Indeed, Graphic Arts does not oppose this motion.

WHEREFORE, the defendants seek an extension of time through and including June 13, 2006 to answer, move, or otherwise plead to plaintiff's complaint.

Dated: May 25, 2006

Respectfully submitted,

DRINKER BIDDLE & REATH LLP

/s/ Warren Pratt

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Attorneys for Defendants

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M. ELAINE McCABE, LOIS M. HOBBS,	:	
and EARL J. SAVAGE	:	
	:	
Defendants.	:	

ORDER

The defendants motion for extension of time to respond to plaintiff's complaint is hereby GRANTED. The defendants shall have through June 13, 2006 to answer, move, or otherwise plead to plaintiff's complaint.

United States District Court Judge

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	:	
Defendants.	:	

CERTIFICATE OF SERVICE

PLEASE TAKE NOTICE that on May 25 2006, I caused a copy of the Motion for Extension of Time for Defendants to Respond to Plaintiff's Complaint to be served upon the following via hand delivery:

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